

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

MEGAN PETE, an individual

Civil Action No. 1:24-cv-24228

Plaintiff,

v.

MILAGRO ELIZABETH COOPER,
an individual,

JURY TRIAL DEMANDED

Defendant.

JOINT SCHEDULING REPORT

Pursuant to Fed. R. Civ. P. 26(f), and Local Rule 16.1(b), counsel for Plaintiff, Megan Pete, (“Plaintiff”) and Defendant Milagro Elizabeth Cooper (“Cooper”), and together with Plaintiff, the “Parties”) conferred on **November 12, 2024** and have mutually agreed to the following proposed scheduling report:

I. MEETING OF THE PARTIES

Pursuant to Local Rule 16.1(b). and Fed. R. Civ. P. 26, the parties met on **November 12, 2024** via telephone conference, in which the following participated:

Name

Mari Henderson, Esq.
Daniel Humphrey, Esq.

Counsel for

Plaintiff Megan Pete
Plaintiff Megan Pete

Michael Hayden, Esq.¹

Defendant Milagro Elizabeth Cooper

Parties Statement of the Case:

Plaintiff Megan Pete, a Florida resident, brings four claims against Defendant Milagro Elizabeth Cooper, a Texas resident, for: violating section 836.13, Florida Statutes

¹ Counsel for Defendant Milagro Elizabeth Cooper are in the process of engaging local counsel.

(Count One: promotion of an altered sexual depiction); violating section 784.0485, Florida Statutes (Count Two: Cyberstalking); intentional infliction of emotional distress (Count Three); and invading her privacy, false light (Count Four). Plaintiff denies these claims.

Summary of uncontested facts: The possibility of the parties agreeing to factual admissions is unknown at this time, although the parties will endeavor to provide admissions of fact and stipulations regarding the authenticity of documents and other issues prior to trial.

- II. Settlement likelihood:** The Parties will explore the possibility of a settlement in good faith; however, it is premature to address whether settlement is likely.
- III. Initial disclosures and Likelihood of additional parties:** Plaintiff states that, based upon her current understanding of the issues, the appearance of additional parties is unknown at this time.
- IV. Case Track:** The Parties propose that this case be assigned to the Standard Track.
- V. Pre-trial schedule:** In accordance with the Standard Track, the Parties propose the following preliminary case deadlines.

Proposed Deadline	Event
November 26, 2024	Exchange of initial disclosures
Within 14 days of ruling on motion to dismiss	Joinder of parties and claims and amendment of pleadings
November 12, 2024	Fact Discovery to commence.
June 16, 2025	Rule 26(a)(3)(A) pretrial disclosures (i.e. trial witnesses and exhibits)
March 14, 2025	Parties to Exchange Expert Reports
March 28, 2025	Parties to Exchange Rebuttal Expert Reports
April 21, 2025	Close of Fact Discovery Close of Expert Discovery
May 19, 2025	Dispositive Motion Deadline
June 23, 2025	Deadline to file Joint pretrial stipulation; joint proposed jury instructions; joint summary of motions in limine
July 7, 2025	Pre-Trial Conference
July 21, 2025 or as soon thereafter as the Court is available.	Trial

- VI. Proposals for issues simplification:** The Parties have committed in good faith to examine any proposals for the formulation and simplification of issues on an on-going basis to facilitate efficient litigation. The Parties agree that each individual party shall each be entitled to file a motion for summary judgment after the close of fact discovery.
- VII. Pending motions and Amendment to Pleadings:** Cooper intends to file a Motion to Dismiss, Change of Venue and is reviewing the possibility of a counter-claim. Depending on the issues raised in that motion and/or the Court's ruling on it, Plaintiff may seek leave to amend, or may amend as of right, the pleadings.
- VIII. Possibility of Obtaining Admissions of Fact and of Documents:** The Parties will engage in a good faith effort to simplify issues regarding admissions of facts and of documents to avoid unnecessary proof and agree to seek advance rulings from the Court on admissibility of evidence at such time as may be necessary.
- IX. Suggestions for the Avoidance of Unnecessary Proof and of Cumulative Evidence:** The Parties do not have suggestions for the avoidance of unnecessary proof and of cumulative evidence at this juncture but agree to meet and confer throughout these proceedings to simply the proof and evidence necessary for this Court's determination.
- X. Statement regarding need for magistrate judge:** The Parties object to having this matter heard by a magistrate judge; however, the Parties do not object to the referral of discovery matters to a magistrate judge.
- XI. Estimated trial length:** At this juncture, the Parties anticipate that this matter will require a one-week jury trial (5 days).
- XII. Requested Date or Dates for Conferences Before Trial, a Final Pretrial Conference, and Trial:** See suggested schedule above.
- XIII. Service list:** A complete service list of the names, addresses, phone numbers, facsimile, and bar numbers of each counsel is attached hereto.

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Dated: November 18, 2024

Respectfully submitted,

**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**

/s/ Daniel L. Humphrey

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*Attorney for Defendant Milagro Elizabeth
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CERTIFICATE OF SERVICE

I hereby certify that on November 18, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing is being served this day on all counsel of record in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel who are not authorized to receive Notice of Electronic Filing.

By: /s/ Daniel L. Humphrey
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/s/ Michael R. Hayden
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